

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO
TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**JOINT RESPONSES TO COURT'S
QUESTIONS 3 AND 4 FOR FURTHER
HEARING ON MOTION TO STRIKE
ASSERTED TRADE SECRET NUMBER 96**

Date: September 6, 2017

Time: 8:00 a.m.

Ctrm: 8, 19th Floor

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

UNREDACTED VERSION OF DOCUMENT TO BE SEALED

1 3. Jointly provide an agreed-upon overlay graph that compares each side's [REDACTED]
2 as described above and is scaled up (or down) such that the [REDACTED] for each side fall on
3 the same positions on the y axis, and the x axis is scaled up (or down) by that same proportion.
4 Where do the [REDACTED] fall in such a comparison?

5 **Response to Question 3:**

6 See page 2 of attached Exhibit A.

7 The plots of the Fuji [REDACTED] were created by using the x, y coordinates from
8 UBER00151175, previously filed as Dkt. 174-3, using the coordinates [REDACTED]

9 [REDACTED] The plots of the GBr3 [REDACTED] were created by using the x, y
10 coordinates from WAYMO-UBER-00003220 at 3235, previously filed as Dkt. 25-8.

11 The plot of GBr3 [REDACTED], maintaining the same
12 aspect ratio, to align the [REDACTED], such that the [REDACTED] have
13 the same y-axis coordinates.

14 4. Also jointly provide an agreed-upon overlay graph that compares each side's [REDACTED]
15 as described above and is scaled up (or down) and tilted as necessary to exactly align the
16 [REDACTED]. Plot the [REDACTED] accordingly, taking care to use the same scaling
17 for both the y axis and the x axis.

18 **Response to Question 4:**

19 See page 4 of Exhibit A.

20 In addition to the methodology described in response to Question 3, the plot for GBr3
21 [REDACTED] was rotated [REDACTED], to align the [REDACTED], such that
22 the [REDACTED] have the same x-axis coordinates. The same aspect ratio was maintained for
23 the entire operation.
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1 Dated: September 5, 2017

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3 By: /s/ Michael A. Jacobs

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16 **ATTESTATION OF E-FILED SIGNATURE**

17 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
18 joint submission. In compliance with General Order 45, X.B., I hereby attest that Jordan Jaffe has
19 concurred in this filing.

20 Dated: September 5, 2017

/s/ Michael A. Jacobs

21 MICHAEL A. JACOBS